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HARRISBURG, PA

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MARY F. D'ANDREA, CLERK
Per ~~MARY F. D'ANDREA, CLERK~~
Deputy ClerkUNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAVINCENZO MAZZAMUTO,
Plaintiff,

v.

UNUM PROVIDENT CORPORATION;
PAUL REVERE LIFE INSURANCE
COMPANY; and NEW YORK LIFE
INSURANCE COMPANY

Defendants

CIVIL ACTION - LAW

NO. 1:CV-01-1157

JUDGE CONNER

JURY TRIAL DEMANDED

**PLAINTIFF'S BRIEF IN SUPPORT OF MOTION TO REOPEN DISCOVERY,
FILE AN AMENDED COMPLAINT, AND EXTEND DEADLINES**

The Court has before it various motions and briefs in support of Plaintiff's Motion to Permit the Filing of Supplemental Expert Reports. These motions and briefs deal with the unfolding investigation of Paul Revere's and UNUMProvident's potentially unfair and/or fraudulent insurance practices. Plaintiff's counsel references and adopts the logic and reasoning in the previously-filed briefs.

The Third Circuit has consistently required the extension of deadlines so long as the opposing party is not "prejudiced." See, Plaintiff's Brief filed on October 21, 2002, in support of Plaintiff's Motion to Permit Supplemental Expert Report.

As things now stand, this case is scheduled to come to trial in March of 2003. Reopening discovery until April 1, 2003, and extending the other deadlines will probably not delay the trial of this case by more than six months. In light of the June 26, 2001, Complaint filing date, this case is a relatively recent filing. Whether recent or not, justice requires that discovery be reopened and deadlines extended.

Respectfully submitted,

ANGINO & ROVNER, P.C.

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Date: 11/19/02

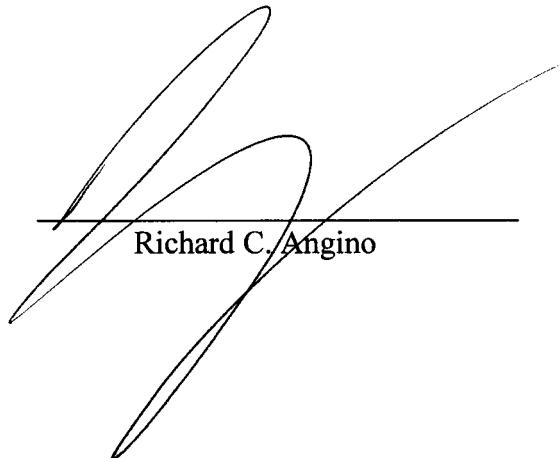
CERTIFICATE OF SERVICE

I, Richard C. Angino, Esquire, hereby certify that a true and correct copy of the foregoing
**PLAINTIFF'S BRIEF IN SUPPORT OF MOTION TO REOPEN DISCOVERY, FILE AN
AMENDED COMPLAINT, AND EXTEND DEADLINES** was served by United States first-
class mail, postage prepaid, upon the following:

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P. O. Box 679
Reading, PA 19603-0679

Counsel for Paul Revere Life Insurance Company and New York Life Insurance
Company

Dated: 11/19/02



A handwritten signature in black ink, appearing to read "Richard C. Angino", is written over a horizontal line. The signature is fluid and cursive, with a large, sweeping loop on the top line and a more compact, horizontal line on the bottom.